

The Honorable James L. Robart

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

NWDC RESISTANCE and COALITION OF
ANIT-RACIST WHITES,

Plaintiffs,

v.

IMMIGRATION & CUSTOMS
ENFORCEMENT, PATRICK J.
LECHLEITNER, in his official capacity as
Deputy Director and Senior Official Performing
the Duties of the Director of Immigration and
Customs Enforcement; and ALEJANDRO
MAYORKAS, in his official capacity as
Secretary of Homeland Security,

Defendants.

Case No. 3:18-cv-05860-JLR

DECLARATION OF KATIE D.
FAIRCHILD

I, Katie D. Fairchild, hereby declare as follows:

1. I am an Assistant United States Attorney for the Western District of Washington.
I represent Defendants, in the above-captioned lawsuit. As such, I am familiar with the records
and file in this matter.

2. Attached as Exhibit A is a true and correct copy of a meet and confer email thread
dated February 7, 2023.

DECLARATION OF KATIE D. FAIRCHILD
[3:18-cv-05860-JLR] - 1

UNITED STATES ATTORNEY
700 Stewart Street, Suite 5220
Seattle, Washington 98101-1271
206-553-7970

1 3. Attached as Exhibit B is a true and correct copy of a meet and confer email thread
2 dated May 15, 2023, with attachment omitted.

3 4. Attached as Exhibit C is a true and correct copy of a meet and confer email thread
4 dated June 26, 2023.

5 5. Attached as Exhibit D is a true and correct copy of a meet and confer email thread
6 dated July 5, 2023.

7 6. Attached as Exhibit E is a true and correct copy of a meet and confer email thread
8 dated August 22, 2023. Consistent with the agreement reflected in Exhibit E, Defendants did not
9 ask the 30(b)(6) deponents about unidentified individuals or a general reduction in membership
10 participation.

11 7. Attached as Exhibit F is a true and correct copy of pertinent portions of the
12 deposition of Melesio Morales Mata, taken on September 22, 2023.

13 8. Attached as Exhibit G is a true and correct copy of pertinent portions of the
14 deposition of Plaintiff Coalition of Anti-Racist Whites' Fed. R. Civ. P. 30(b)(6) representative,
15 taken on August 23, 2023.

16 9. Attached as Exhibit H is a true and correct copy of of pertinent portions of the
17 deposition of Plaintiff La Resistencia's Fed. R. Civ. P. 30(b)(6) representative, taken on August
18 28, 2023.

19 10. Attached as Exhibit I is a true and correct copy of a document produced by Anti-
20 Racist Whites in discovery beginning with bates number CARW000503. It was redacted by
21 Plaintiffs' counsel for public filing.

22 11. Attached as Exhibit J is a true and correct copy of a document produced by Anti-
23 Racist Whites in discovery beginning with bates number CARW000045. It was redacted by
24 Plaintiffs' counsel for public filing.

Executed in Seattle, Washington, on this 18th day of December, 2023.

Email: katie.fairchild@usdoj.gov